

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

BRYAN P. SPENCE, individually §
and as a representative of a class of §
similarly situated persons, and on §
behalf of the AMERICAN AIRLINES, §
INC. 401(K) PLAN and the §
AMERICAN AIRLINES, INC. 401(K) §
PLAN FOR PILOTS, §

Plaintiffs,

v.

AMERICAN AIRLINES, INC., and the §
AMERICAN AIRLINES EMPLOYEE §
BENEFITS COMMITTEE, §

Defendants. §

Case No. 4:23-cv-00552-O

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO SUBMIT CROSS-
SUPPLEMENTAL BRIEFING**

Pursuant to Local Rule 7.1 and Federal Rule of Civil Procedure 6(b), Plaintiff Bryan P. Spence requests an extension of time for the Parties to file cross-supplemental briefing by fourteen (14) days to February 14, 2025. In support of this motion, Plaintiff states the following:

1. On January 10, 2025, after reviewing the pleadings, testimony, and evidence admitted at trial, the Court entered its Findings of Facts and Conclusions of Law pursuant to Fed. R. Civ. P. 52(a). ECF No. 157.

2. In concluding its Findings of Facts and Conclusions of Law, the Court required the Parties to submit cross-supplemental briefing no later than January 31, 2025 to address certain question raised by the Court. ECF No. 157 at 69-70.

3. Counsel for Plaintiff and the Certified Class had/have several intervening deadlines, including a summary judgment response due January 15, defending a client deposition on January 21, a motion for summary judgment due January 23, an opening brief on a question certified to Supreme Court of Kansas due January 22, 2025; in-person depositions on January 23 and 27, 2025; and a status conference with another federal court on January 28, 2025. Undersigned Plaintiff's counsel has also been dealing with a very time-sensitive matter for another client that will not be resolved until January 22 at the earliest.

4. The requested extension is sought in good faith and will not prejudice any case deadlines.

5. Plaintiff has met and conferred with Defendants, and Defendants join in this request for extension.

For the foregoing reasons, Plaintiff respectfully requests that the Court extend the deadline for the Parties to submit cross-supplemental briefing by fourteen (14) days to February 14, 2025.

Dated: January 18, 2025.

Respectfully submitted.

/s/ Heather Gebelin Hacker
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CERTIFICATE OF CONFERENCE

I hereby certify that on January 15, 2025, Plaintiff's counsel conferred with Defendants' counsel Russell Cawyer who confirmed his clients do not oppose this request.

/s/ Heather Gebelin Hacker
Heather Gebelin Hacker

CERTIFICATE OF SERVICE

I hereby certify that on January 18, 2025, this document was served through the Court's CM/ECF Document Filing System upon all counsel of record.

/s/ Heather Gebelin Hacker
Heather Gebelin Hacker